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July 7, 2022

VIA ECF

Honorable Robert D. Mariani
William J. Nealon Federal Building
& United States Courthouse
235 N. Washington Avenue
Scranton, PA 18503

RE: Steven Plavin, et al. v. Group Health Inc. – No. 3:17-cv-1462-RDM

Dear Judge Mariani:

I write on behalf of all parties in the above-referenced matter to request modification of the case management schedule governing this litigation.

Under the Order currently governing the schedule for this matter (“Scheduling Order”) (ECF 109; issued May 29, 2022), the deadline for fact discovery is July 8, 2022. The parties have been diligently engaging in discovery activities and to date have substantially completed their document productions and taken seven depositions in the matter. However, due to multiple scheduling difficulties that have arisen with certain fact and third-party witnesses, as well as the need to schedule and conduct the deposition of Steven Plavin pursuant to the Court’s Memorandum and Order issued June 27, 2022 (ECF 114-15), counsel for all parties have met and conferred and agree that additional time for their ongoing discovery efforts is necessary.

Therefore, the parties jointly propose the following amendments to the Scheduling Order:

- Close of Fact Discovery: August 8, 2022;

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- Plaintiffs' affirmative expert reports related to class certification, if any, due: September 8, 2022;
- Defendant's affirmative expert reports related to class certification, if any, due: October 7, 2022;
- Supplementations to the parties' expert reports related to class certification, if any, due: November 4, 2022;
- Plaintiffs' Motion for Class Certification due: November 30, 2022;
- Defendant's Opposition to Class Certification due: January 13, 2023; and
- Plaintiffs' Reply due: February 10, 2023.

The parties therefore stipulate and agree, and respectfully request that the Court issue the Stipulated Order Modifying the Scheduling Order, which has been filed herewith. In accordance with Local Rule 7.1, a Certificate of Concurrence has also been filed.

Respectfully,

LeVAN STAPLETON SEGAL COCHRAN LLC

/s/ Peter H. LeVan, Jr.

Peter H. LeVan, Jr.

Counsel for Defendant

Enclosures

cc: All Counsel of Record (via ECF System)